III. FY 01: BPD Reports Submitted by Manufacturers of Biological Products Other Than Blood and Blood Components (Non-Blood)

The number of reports submitted by non-blood manufacturers increased by 54% from FY 00 to FY01, with the greatest increase being in reports involving precipitate in final allergenic products. Allergenic manufacturers submitted 28 reports in FY-00 and 176 reports in FY-01 related to precipitate found in the final product, events most often discovered by customers.

Total BPDs By Manufacturing System

TYPE OF BPD	ALLERGENIC	DERIVATIVE	IN-VITRO DIAGNOSTIC	THERAPEUTIC	VACCINE	TOTAL	
Incoming Material	2	8	0	1	1	12	3.0%
Process Controls	6	6	4	2	5	23	5.8%
Testing	1	1	1	0	5	8	2.0%
Labeling	27	7	10	1	6	51	12.8%
Product Specifications	183	23	6	10	32	254	63.8%
Quality Control & Distribution	5	11	5	3	1	25	6.3%
Miscellaneous	0	0	1	0	1	2	0.5%
Not Reportable	19	0	1	2	1	23	5.8%
Total	*243*	*56*	*28*	*19*	*52*	398	100%

***Potential* Recalls By Manufacturing System**

TYPE OF BPD	ALLERGENIC	DERIVATIVE	IN-VITRO DIAGNOSTIC	THERAPEUTIC	VACCINE	TOTAL	
Incoming Material	0	1	0	1	0	2	4.7%
Process Controls	0	0	3	1	0	4	9.3%
Testing	1	0	0	0	0	1	2.3%
Labeling	9	0	6	0	0	15	34.9%
Product Specifications	3	3	6	5	1	17	41.9%
Quality Control & Distribution	0	0	3	0	0	3	7.0%
Miscellaneous	0	0	1	0	0	1	0.0%
Total	*13*	*4*	*19*	*7*	*1*	*43*	100%

ALLERGENIC

BIOLOGICAL PRODUCT DEVIATION	# REPORTS
INCOMING MATERIAL SPECIFICATIONS	***2***
Container	
Specifications not met	1
Defective	1
PROCESS CONTROLS	***6***
Treatment set manufactured with incorrect diluent	1
Manufacturing or processing performed using incorrect parameters	
Aseptic processing procedures not performed according to specifications	1
Other	1
Bulk material does not meet specifications or otherwise determined to be unsuitable	
Discolored	1
Cardboard in vial	1
Contains precipitate	1
TESTING	***1***
Sterility-performed incorrectly	1
LABELING	***27***
2 different product species were from same source material	1
Product label incorrect	2
Expiration date – Extended	5
Expiration date – Missing	11
Lot number incorrect	2
Concentration or volume incorrect	6
PRODUCT SPECIFICATIONS	***183***
Produce specification not met	
Sterility test on associated lot failed	2
Fill volume	2
Appearance	1
Dull needles from vendor	1
Contains precipitate	176
Stability testing failed-potency	1
QUALITY CONTROL & DISTRIBUTION	***5***
Miscellaneous	
Distributed to incorrect patient	1
Incorrect product type distributed	2
Product distributed inappropriately-failed gown test	1
Shipping and storage-product shipped at incorrect temperature	1
NOT REPORTABLE	***19***
Release of product other than that which was ordered, labeled appropriately	10
Shipment to incorrect facility	3
Event not under control of reporting establishment	1
Product made available for distribution, but not distributed	5
TOTAL	***243***

DERIVATIVES

BIOLOGICAL PRODUCT DEVIATION	# REPORTS
INCOMING MATERIAL SPECIFICATIONS	***8***
Container – defective	1
Closures - specifications not met	1
Closures – defective	2
Source or raw material does not meet specifications or otherwise found to be unsuitable	
Source plasma donor determined to be unsuitable	3
Testing deviation	1
PROCESS CONTROLS	***6***
Manufacturing or processing performed using incorrect parameters	
Aseptic processing procedures not performed according to specifications	1
Process/procedures - failure to follow prescribed documentation procedures	1
Process water - specifications not met - purified water	1
Bulk material does not meet specifications or otherwise determined to be unsuitable	
Contaminated with microorganisms	2
Stored for an excessive hold time	1
TESTING	***1***
Sterility-not performed or not documented	1
LABELING	***7***
Product label missing	3
Carton label incorrect	1
Carton label missing	2
Expiration date missing	1
PRODUCT SPECIFICATIONS	***23***
Miscellaneous	
Component packaged with final product failed to meet specifications	4
Elevated bilirubin levels	1
Produce specification not met - contains precipitate	4
Stability testing failed	1
Vacuum failure	1
Unacceptable "other protein" peak %	1
% Albumin	1
Non-uniform pellets	1
Stopper discoloration	2
Potency	4
Container closure integrity	1
Chemical analysis/purity	1
QUALITY CONTROL & DISTRIBUTION	***11***
Product distributed inappropriately-distributed prior to validation of process	1
Shipping and storage-product shipped at incorrect temperature	9
Product identified as unacceptable and not quarantined-unacceptable vacuum results	1
TOTAL	***56***

IN-VITRO DIAGNOSTICS

BIOLOGICAL PRODUCT DEVIATION	# REPORTS
PROCESS CONTROLS	***4***
Failure to test treated lots with appropriate antisera	1
Filling not performed according to specifications	1
Process water - specifications not met -reagent water	1
Bulk Material contaminated with microorganisms	1
TESTING: Identity testing not performed or not documented	***1***
LABELING	***10***
Product label incorrect	7
Product label missing	2
Lot number incorrect	1
PRODUCT SPECIFICATIONS	*6*
Produce specification not met	
Unexpected appearance to negative test reactions	1
Increased initial reactive rate	1
Contaminated with green particles	1
Contaminated with microorganisms	1
Potency	2
QUALITY CONTROL & DISTRIBUTION	***5***
Incomplete number of final packages inspected	1
Shipping and storage	
Product shipped at incorrect temperature	1
Product stored at incorrect temperature	3
MISCELLANEOUS	***1***
Computer software contained error in dilution calculation	1
NOT REPORTABLE	***1***
Automated Blood Bank instrument reported ABO or Rh mistypings (device not subject to BPD reporting)	1
TOTAL	***28***

THERAPEUTICS

BIOLOGICAL PRODUCT DEVIATION	# REPORTS
INCOMING MATERIAL SPECIFICATIONS	***1***
Container-defective	1
PROCESS CONTROLS	***2***
Manufacturing or processing performed using incorrect parameters	
Maximum column load exceeded	1
Bulk material does not meet specifications or otherwise determined to be unsuitable	
Contains precipitate	1
LABELING	***1***
Incorrect patient identification number	1
PRODUCT SPECIFICATIONS	***10***
Product specifications not met - contaminated with microorganism	5
Stability testing failed	
Percent single chain failure	1
Percent monomer	1
Potency	2
Chemical analysis/purity	1
QUALITY CONTROL & DISTRIBUTION	***3***
Product distributed inappropriately-distributed prior to validation of process	1
Shipping and storage	
Stored in liquid nitrogen instead of vapor phase	1
Shipping and storage-product shipped at incorrect temperature	1
NOT REPORTABLE	***2***
Product labeled with incorrect facility identifiers, product acceptable	1
Prior to distribution, product determined to be suitable	1
TOTAL	***19***

VACCINES

BIOLOGICAL PRODUCT DEVIATION	# REPORTS
INCOMING MATERIAL SPECIFICATIONS	***1***
Container-defective	1
PROCESS CONTROLS	***5***
Discrepancy between SOP batch records and product license application	1
Manufacturing or processing performed using incorrect parameters - incorrect column volume	1
Process/procedures – failed media fill	1
Bulk material does not meet specifications or otherwise determined to be unsuitable	
Impurities exceeded specification	1
Other	1
TESTING	***5***
Sodium Chloride not qualified	1
Safety - performed incorrectly	1
Sterility – not performed or not documented	1
Stability - not performed or not documented	2
LABELING	***6***
Ink smeared on vial labels	1
Package insert incorrect	1
Expiration date extended	2
Concentration or volume incorrect	2
PRODUCT SPECIFICATIONS	***32***
Component packaged with final product failed to meet specifications	2
Product specifications not met	
Appearance	1
Contains precipitate	3
Moisture	2
Preservative content	1
Potency	2
Stability testing failed	
pH	2
Fill volume	1
PT responder rate	1
Potency	13
Preservative content	1
Chemical analysis/purity	3
QUALITY CONTROL & DISTRIBUTION	***1***
Shipping and storage -vials broken or cracked during shipment	1
MISCELLANEOUS	***1***
Test animals exhibited tetanus toxicity	1
NOT REPORTABLE	***1***
Intermediate product affected, final product not affected	1
TOTAL	***52***

NON-BLOOD MANUFACTURES

Timeliness Of Reportable BPDs

Number Of Days From Date BPD Discovered To FDA Received

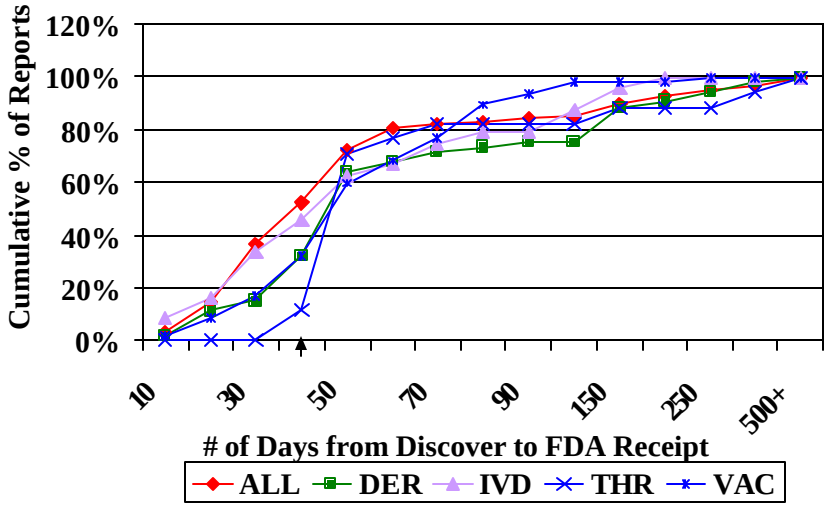
CUMULATIVE PERCENT OF REPORTS	Allergenic (Days)	Derivative (Days)	In-Vitro Diagnostic (Days)	Therapeutic (Days)	Vaccine (Days)	TOTAL (Days)
10%	18	19	10	32	26	19
25%	25	32	25	42	34	27
50%	36	44	42	47	45	43
75%	53	68	67	53	63	56
90%	88	92	96	140	77	140
# REPORTS	214	53	24	17	47	355
RANGE	3-899	10-848	9-160	32-581	9-207	3-899
AVERAGE	76	87	57	109	53	75
# Reports lacking date discovered	*10*	*3*	*3*	*0*	*4*	*20*

Adherence To 45 Day Required Time For Reporting

(Reporting Time = Date of FDA receipt – Date of discovery of BPD)

Reporting Time (days)	Allergenics		Derivatives		In-Vitro Diagnostics		Therapeutics		Vaccines		Total	
< or = 45	137	64.0%	24	45.3%	12	50.0%	5	29.4%	23	48.9%	201	56.6%
Between 45 and 90	44	20.6%	16	30.2%	7	29.1%	9	52.9%	21	44.7%	97	27.3%
> 90	33	15.4%	13	24.5%	5	20.8%	3	17.6%	3	6.4%	57	16.1%
Total	214	100%	53	100%	24	100%	17	100%	47	100%	355	100%

FY-2001
Non-Blood BPD Reporting Timeliness



Total Reports = 355 Allergenics = 214; Derivatives = 53; In-Vitro Diagnostics = 24; Therapeutics = 17; Vaccines = 47